



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103 2029

Mr Michael D Mahoney  
GBCI Director, Facilities Support  
Central Intelligence Agency  
5 x 32 NHB  
Gate 5  
1000 Colonial Road  
McLean VA 22101

MAR 03 2015

Dear Mr Mahoney

Thank you for your letter dated January 30, 2015 regarding a self-disclosure for potential violations of the Resource, Conservation and Recovery Act (RCRA I) which regulates underground storage tanks. The potential violations occurred at the George Bush Center for Intelligence located in Fairfax, VA. Your letter is currently being reviewed by Region III's Land and Chemical Division.

EPA will contact you in writing for any additional information needed to determine whether the disclosure meets the conditions of EPA's April 11, 2001 Incentives for Self Policing, Discovery, Disclosure, Correction and Prevention of Violations, (Audit Policy), as set forth in Section IID of that Policy.

Should you have any questions regarding the Audit Policy, please contact Betty Barnes at 215 814 3447. EPA's website has additional information, and can be found at <http://es.epa.gov/compliance/incentives/index.html> or at [www.epa.gov/region3/audits](http://www.epa.gov/region3/audits) (Click on compliance assistance then audits).

Sincerely,

A handwritten signature in black ink, appearing to read "Samantha Beers".

Samantha Phillips Beers, Director  
Office of Enforcement, Compliance and  
Environmental Justice

cc C Amend



Central Intelligence Agency



Washington D.C. 20505

January 30 2015

Samantha Phillips Beers Esq Director  
Director Office of Enforcement, Compliance and Environmental Justice  
U.S. Environmental Protection Agency Region 3 3EC00  
1650 Arch Street  
Philadelphia PA 19103

Re George Bush Center for Intelligence Self Disclosure under EPA Audit Policy – Motor Pool  
Underground Storage Tanks

A voluntary internal underground storage tank (UST) audit was conducted at the George Bush Center for Intelligence (GBCI) on January 28 2015. The following two issues were discovered that resulted from the Motor Pool gasoline tank replacement project ( Project ) occurring between September 2014 through December 2014.

1. The Project consisted of the removal & replacement of three 10 000 gallon USTs while maintaining one 6 000 gallon diesel UST and one 6 000 gallon used oil UST in full operation. The Project's Contractor determined that wiring from the diesel UST to the Veeder Root panel was not compliant with updated Veeder Root requirement of having a single run of cable between the tank and panel (the existing system had multiple junctions). The contractor replaced the diesel cable in September 2014 disabling the Veeder Root panel's ability to perform leak tests or to read interstitial probes. When the Contractor reconnected the Veeder Root panel to the diesel UST the panel was not 'reset' to test the diesel UST and used oil UST interstitial probes and to perform CSLD leak detection on these two tanks between September 2014 through December 2014. This issue was resolved at the completion of the Project in January 2015. Leak detection is required per 9VAC25 580 50 6.

The Contractor was tasked by the Government Contracting Officer's Technical Representative with the requirement that the Veeder Root system must remain functional for the diesel UST and used oil UST during the entire gasoline UST replacement construction process. In addition the GBCI employee in charge of the Veeder Root panel assumed that the Veeder Root malfunction was a planned part of the UST replacement project and did not contact Environment Safety Staff to notify them of the Veeder Root malfunction.

For future efforts GBCI will add additional contract language for UST replacement and repairs to ensure that the UST monitoring systems are functioning at the end of each working day and to formally contact their Contracting Officer in the event the monitoring system is not properly functioning. GBCI Environmental Safety Staff will repeat Operator C training for staff at the Motor Pool to ensure that every alarm condition or malfunction is properly reported to Environmental Safety Staff immediately.

- 2 Per 9VAC25 580-170 annual testing of the automatic line leak detectors (ALLD) and the pressurized lines is required. The diesel tank was tested and certified on September 11, 2013. In September 2014, the tank was taken out of service for the above referenced Project. The tank was placed back into service in January 2015 and subsequently tested and certified. (The used oil tank is gravity based and therefore does not require this testing.) Going forward, GBCI will continue the required annual testing of these Motor Pool tanks.

Neither of these issues resulted in harm to human health or the environment, and GBCI remains committed to maintaining compliance with all Federal, State, and local regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D. Mahoney".

Michael D. Mahoney  
GBCI Director, Facilities Support

cc Mr. Earl Wagner, EPA  
Mr. Stephen Hughes, VADEQ